Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
Location-Based Routing	)	PS Docket No. 18-64
For Wireless 911 Calls	)	
	)	

REPLY COMMENTS OF MOTOROLA SOLUTIONS INC.

The comments filed in response to the Federal Communications Commission's ("Commission") *Notice of Inquiry* underscore that a multitude of solutions are being developed to provide accurate and timely location-based routing of 9-1-1 calls.[1] As noted in Motorola Solutions, Inc.'s initial comments, device-based hybrid location solutions are among the most promising developments, and other commenters concur that these solutions hold immense potential.[2]

Indeed, this potential is already being realized, as confirmed by Apple's recent announcement that it will use RapidSOS's "Internet Protocol-based data pipeline to quickly and securely share [Hybridized Emergency Location ("HELO")] location data with 911 centers [to improve] response time [during emergencies]."[3] According to Apple, "RapidSOS's system will deliver the emergency location data of iOS users by integrating with many 911 centers' existing

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1 *Location-Based Routing for Wireless 911 Calls*, Notice of Inquiry, PS Docket No. 18-64, FCC 18-32 (rel. March 23, 2018) ("*Notice of Inquiry*").

2 *See* Comments of ESRI, PS Docket 18-64, at 6 (filed May 6, 2018); Comments of LaaSer Critical Communications, PS Docket 18-64, at 4 (filed May 7, 2018); Comments of Onvoy, LLC d/b/a Inteliquent, PS Docket 18-64, at 2 (filed May 7, 2018).

3 Apple Inc., *Apple's iOS 12 securely and automatically shares emergency location with 911*, Press Release (June 18, 2018), *available at* https://www.apple.com/newsroom/2018/06/apple-ios-12-securely-and-automatically-shares-emergency-location-with-911/ ("Apple Announcement").

software, which rely on industry-standard protocols."[4] More specifically, once an emergency call is made, the caller's location and additional data will be sent to RapidSOS's NG911 Clearinghouse, which " is a NENA i3 compliant Location Information Server (LIS) and Additional Data Repository (ADR) that integrates into most major 911 call-taking, dispatching and mapping systems."[5]

Motorola Solutions disagrees with the suggestion by one commenter that device-based hybrid location information may not be "sufficiently reliable to support call routing."[6] On the contrary, testing has confirmed that such location information routing "is faster and more accurate than traditional E9-1-1 location [information routing]."[7]

With today's use of multiple call location determination technologies, and with the potential development of future technologies for routing 9-1-1 calls, there may be multiple providers of "call location" information and multiple means of delivering that information. Thus, Motorola Solutions does not agree that location information providers should be required "to interconnect to the carrier routing element before delivery to the PSAP" or that "third-party applications" should be prohibited "from providing wireless 9-1-1 location information or routing solutions without carrier interconnection and oversight over device-based

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4 *Id.*

5 RapidSOS, https://www.rapidsos.com/ng911clearinghouse/.

6 Comments of NextNav, LLC, PS Docket 18-64, at 3 (filed May 7, 2018).

7 Comments of RapidSOS, Inc., PS Docket 18-64, at 2-3 (filed May 7, 2018); *see also* Communications Security, Reliability and Interoperability Council V, Working Group 1, Evolving 911 Services, Final Report – Task 2: 911 Location-Based Routing, at 17 (Sep. 2016) 17 ("DBH is a proven location method for commercial location services. Google maps, Apple maps, Uber and like applications use DBH with very good results, at least in the more ideal outdoor locations."), *available at* https://www.fcc.gov/about-fcc/advisory-committees/communications-security-reliability-and-interoperability#block-menu-block-4).

hybrid location information."[8] However well intended this proposal may be, it would inevitably stifle innovation.

Rather, in order for the location based routing system to make the best routing decisions possible – and thus reduce the misrouting of 9-1-1 calls – the Commission should require that all providers with available "call" locations make this information available to the routing system through various paths (OSP connectivity, ESInet connectivity, URL lookup). Furthermore, to leave room for future advances, providers should not be precluded from also delivering data, including "call location," to PSAPs via an interface that complies with industry standard protocols.[9]

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Respectfully submitted,

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8 Comments of West Safety Services, Inc. PS Docket 18-64, at 16 (filed May 7, 2018).

9 *See, e.g.,* NENA Standard for NG9-1-1 Additional Data, National Emergency Number Association, NENA-STA-012.2-2017 (2017), *available at* https://cdn.ymaws.com/www.nena.org/resource/resmgr/standards/NENA-STA-012.2_AddlData_2017.pdf.